

EXHIBIT C

UNITED STATES DISTRICT COURT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILEDfor the
District of Vermont

2018 APR -3 AM 11:44

CLERK

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Case No. 2:18-mj-34

BY H3C
DEPUTY CLERKU.S. First-Class parcel nos. 9500115375968088093256,
9500115375968088093270, 9500115375968088093263,
9505515375968088093303, 9505515375968088093297,
and 9505515375968088093280

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A.

located in the _____ District of _____ Vermont _____, there is now concealed (identify the person or describe the property to be seized):

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

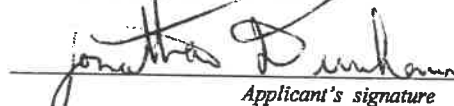
The search is related to a violation of:

Code Section
21 U.S.C. §§ 841(a)(1) & 846Offense Description
Possessing with intent to distribute, distributing, and conspiring to possess with intent to distribute and to distribute, controlled substances.

The application is based on these facts:

See attached Affidavit.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Jonathan Dunham, U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date:

04/03/2018

City and state: Burlington, Vermont



Judge's signature

Hon. John M. Conroy, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

Item to be Searched:

Subject Parcel #1: The following First-Class parcel, presently in the possession of the U.S. Postal Inspection Service at 8 New England Drive, Essex Junction, VT 05452:

First-Class Parcel Number:

9500115375968088093256

Sender Name and Address:

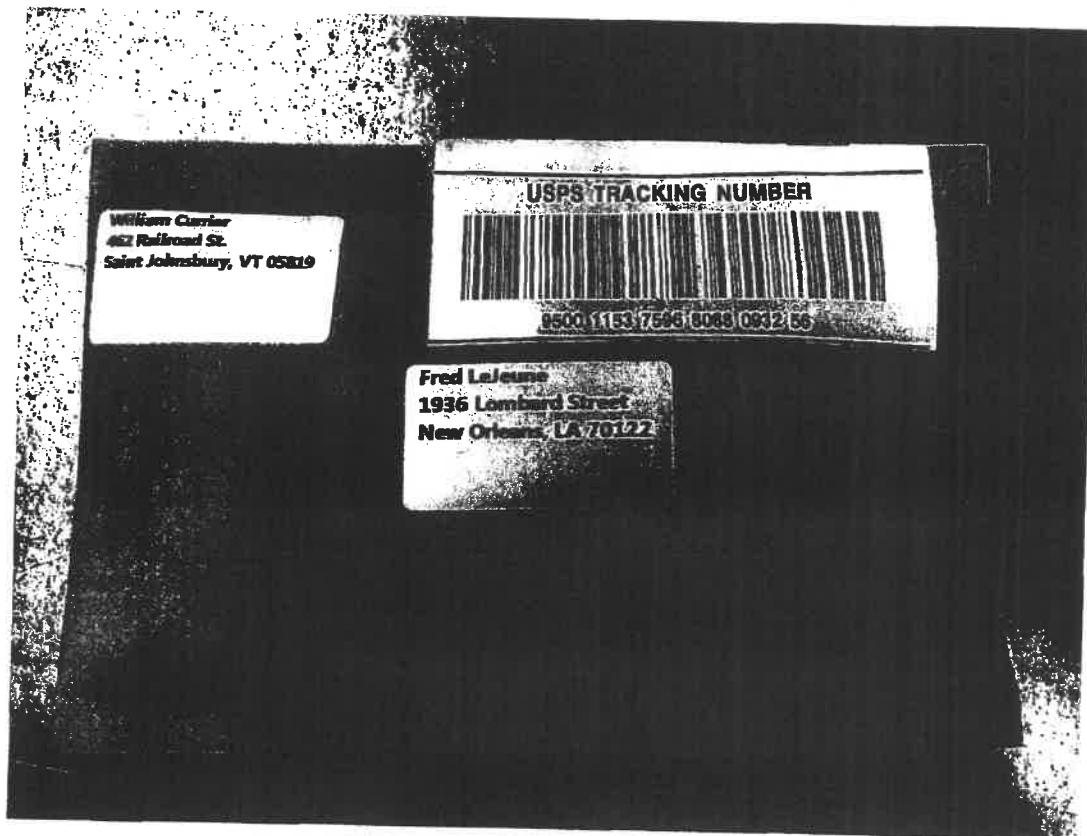
William Currier
462 Railroad Street
Saint Johnsbury, VT 05819

Recipient Name and Address:

Fred Lejeune
1936 Lombard Street
New Orleans, LA 70122

Parcel Weight:

0 pounds, 0.40 ounces



Attachment A

00000219

Subject Parcel #2: The following First-Class parcel, presently in the possession of the U.S.

Postal Inspection Service at 8 New England Drive, Essex Junction, VT 05452:

First-Class Parcel Number:

9500115375968088093270

Sender Name and Address:

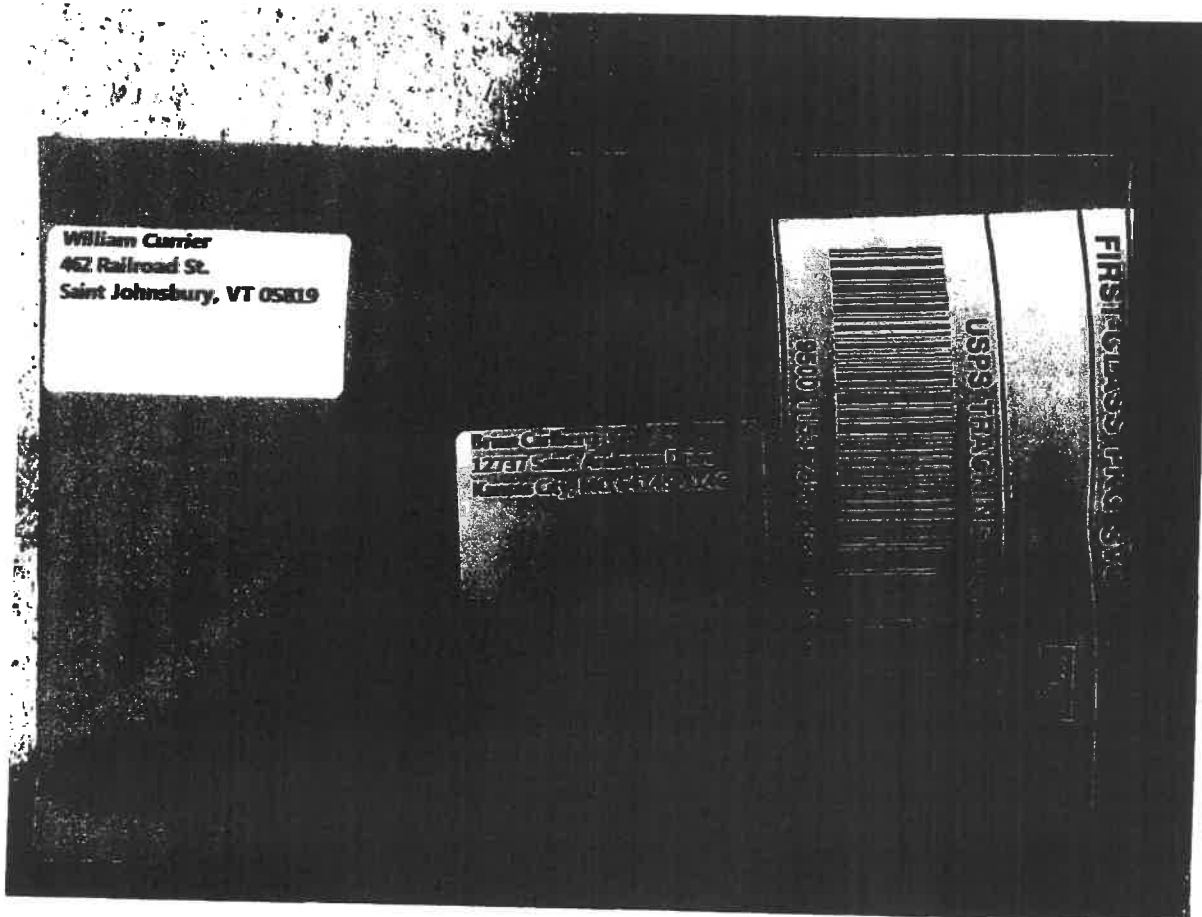
William Currier
462 Railroad Street
Saint Johnsbury, VT 05819

Recipient Name and Address:

Brian Carlberg
12737 Saint Andrews Drive
Kansas City, MO 64145-1146

Parcel Weight:

0 pounds, 0.40 ounces



Attachment A

00000220

Subject Parcel #3: The following First-Class parcel, presently in the possession of the U.S.

Postal Inspection Service at 8 New England Drive, Essex Junction, VT 05452:

First-Class Parcel Number:

9500115375968088093263

Sender Name and Address:

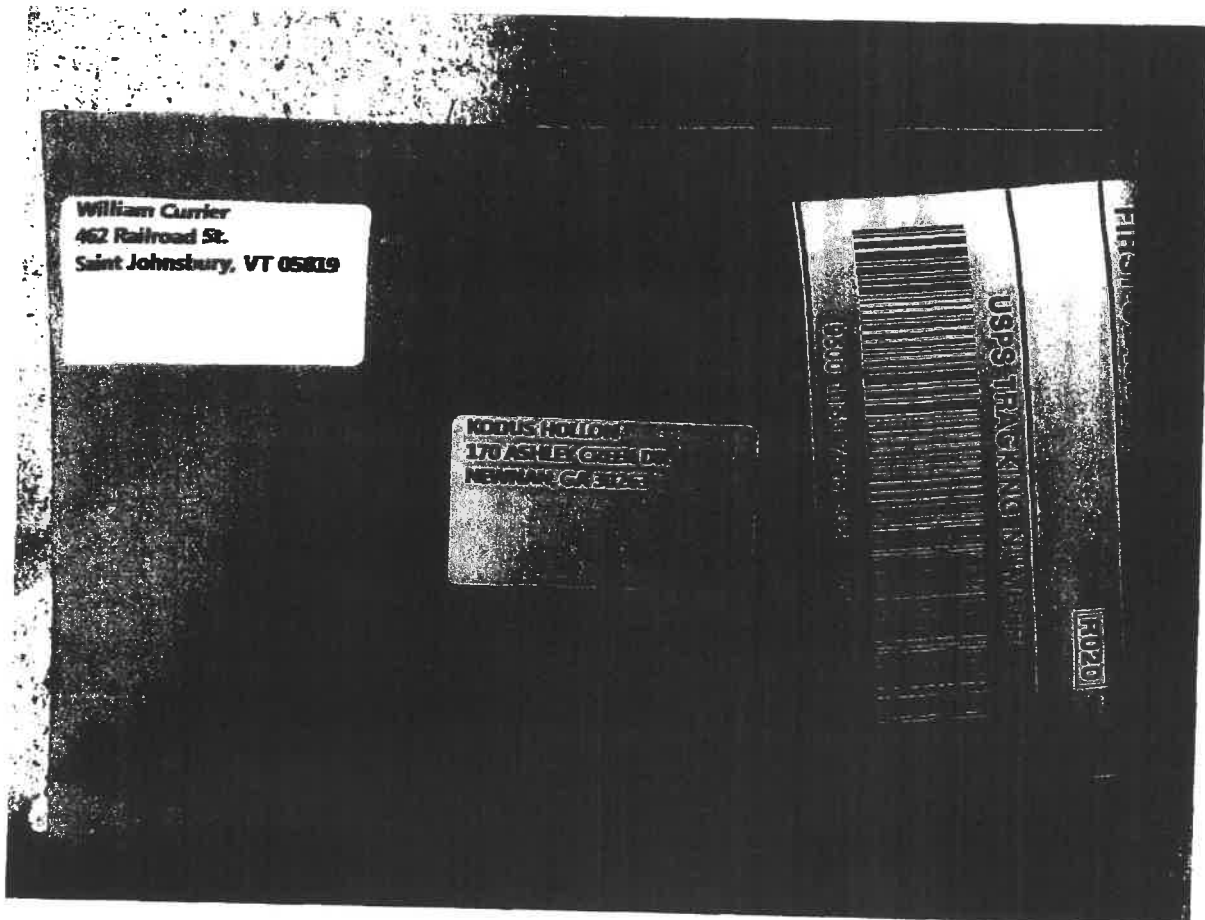
William Currier
462 Railroad Street
Saint Johnsbury, VT 05819

Recipient Name and Address:

Kodus Hollon
170 Ashley Creek Drive
Newnan, GA 30263

Parcel Weight:

0 pounds, 0.40 ounces



Attachment A

00000221

Subject Parcel #4: The following U.S. Priority Mail parcel, presently in the possession of the U.S. Postal Inspection Service at 8 New England Drive, Essex Junction, VT 05452:

First-Class Parcel Number:

9505515375968088093303

Sender Name and Address:

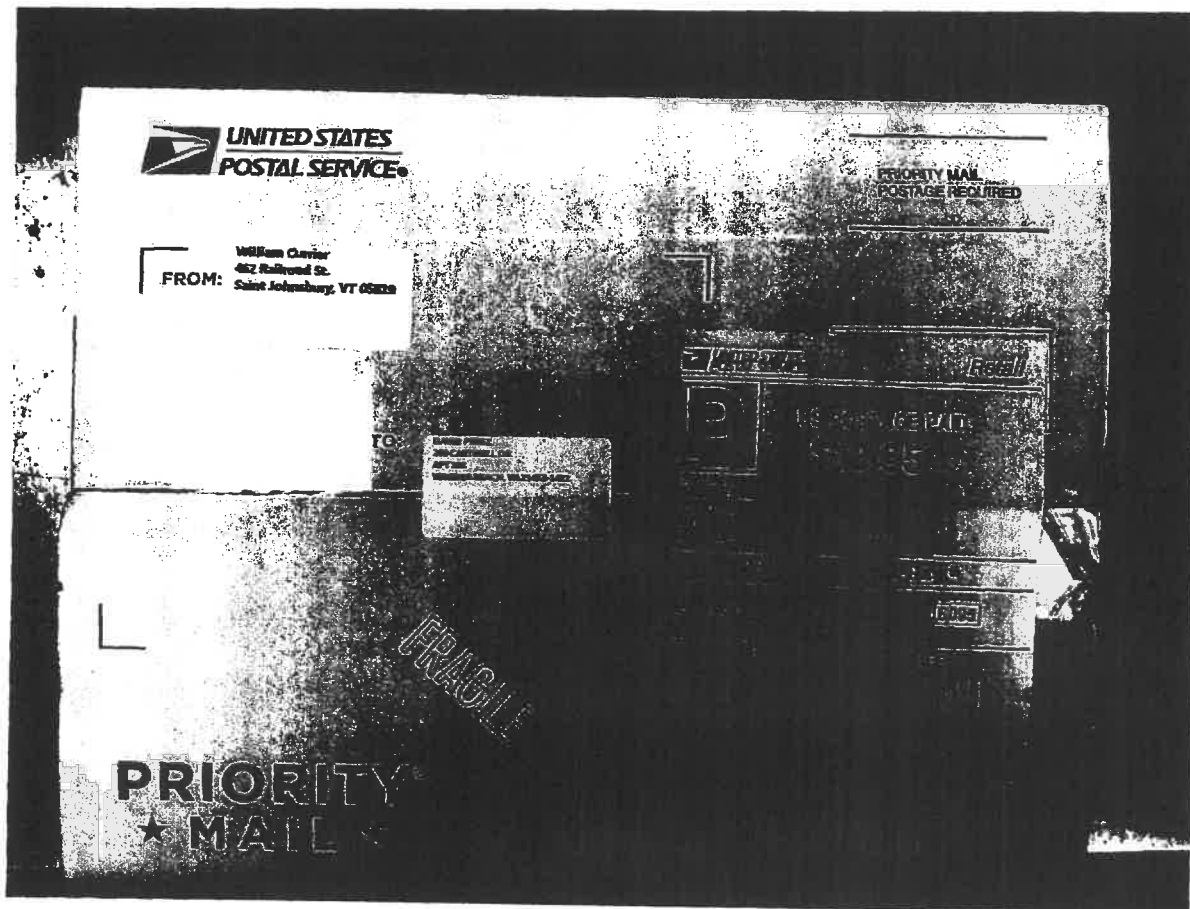
William Currier
462 Railroad Street
Saint Johnsbury, VT 05819

Recipient Name and Address:

David Perez
208 Cartwell Drive
Virginia Beach, VA 23452-1422

Parcel Weight:

3 pounds, 14.20 ounces



Attachment A

00000222

Subject Parcel #5: The following U.S. Priority Mail parcel, presently in the possession of the U.S. Postal Inspection Service at 8 New England Drive, Essex Junction, VT 05452:

First-Class Parcel Number:

9505515375968088093297

Sender Name and Address:

William Currier
462 Railroad Street
Saint Johnsbury, VT 05819

Recipient Name and Address:

Alex Guariglia
491 Vizcay Way
Davenport, FL 33837-2618

Parcel Weight:

0 pounds, 2.60 ounces



Attachment A

00000223

Subject Parcel #6: The following U.S. Priority Mail parcel, presently in the possession of the U.S. Postal Inspection Service at 8 New England Drive, Essex Junction, VT 05452:

First-Class Parcel Number:	9505515375968088093280
Sender Name and Address:	William Currier 462 Railroad Street Saint Johnsbury, VT 05819
Recipient Name and Address:	Jonathan Tipton 426 Elgin Street, Mooringsport, LA 71060-8960
Parcel Weight:	0 pounds, 2.60 ounces



Attachment A

00000224

ATTACHMENT B

ITEMS TO BE SEIZED

1. Any and all evidence and/or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), 843(b) and 846, distribution of controlled substances, possession with intent to distribute controlled substances, and conspiracy to possess with intent to distribute and to distribute controlled substances, including the following:
 - a. Controlled substances, substances suspected to be controlled substances, drug processing and packaging material, cutting agents, and drug paraphernalia and literature;
 - b. Money, including cash or other financial instruments, and/or any records of financial transfers, sales or purchases;
and
 - c. Any and all information, in whatever form located, identifying the true sender of the packages, the nature of any payment for the materials shipped, the identity of the intended recipient, the nature or manner of the communications and relationship between shipper and recipient, and/or the involvement of any other individuals in obtaining, possession and/or shipping controlled substances.

AFFIDAVIT

I, Jonathan Dunham, after being duly sworn, depose and state as follows:

INTRODUCTION AND BACKGROUND

1. I am a Postal Inspector employed by the U.S. Postal Inspection Service and assigned to the Boston Division. The Boston Division has responsibility for Postal Inspection Service investigations in Massachusetts, New York, Vermont, Connecticut, New Hampshire, Maine, and Rhode Island. I have been employed by the Inspection Service for one year, and am currently assigned to the Burlington, Vermont Domicile.
2. I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. §2510(7), in that I am empowered by law to conduct investigations and to make arrests for federal offenses.
3. My training and experience includes a Bachelor of Science degree in Criminal Justice, a Bachelor of Art degree in Psychology, a certificate in Homeland Security, and a Master's degree in Criminal Justice from Westfield State University; Postal Inspector Basic Training at Potomac, Maryland; and Postal Inspector Post-Basic Training at Burlington, Vermont. During the course of my employment with the Postal Inspection Service, I have conducted or participated in criminal investigations, including incidents where the U.S. Mail was used for the purpose of possessing with intent to distribute, distributing, and conspiring to possess with intent to distribute and to distribute, controlled substances, in violation of Title 21, U.S.C. §§ 841(a)(1) and 846.
4. The information contained in this affidavit is based upon my personal observations, my training and experience, my own investigation, and the investigation of other

law enforcement officers, including but not limited to, Homeland Security Investigations (HSI) Agent Jamie West, with whom I have consulted.

5. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for the search warrant, it does not set forth every fact that I or others have learned during the course of this investigation.

ITEMS TO BE SEARCHED

6. I submit this affidavit in support of an application for a warrant to search the following parcels (hereinafter referred to as the Subject Parcels) which were placed in the U.S. mail at the Danville, VT Post Office on March 29, 2018:

a. U.S. First-Class parcel number **9500115375968088093256**, mailed to "Fred LeJeune, 1936 Lombard Street, New Orleans, LA 70122," from sender "William Currier, 462 Railroad Street, Saint Johnsbury, VT 05819" ("Subject Parcel #1"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #1 weighs 0 pounds, 0.40 ounces and is further described in Attachment A.

b. U.S. First-Class parcel number **9500115375968088093270**, mailed to "Brian Carlberg, 12737 Saint Andrews Drive, Kansas City, MO 64145-1146" from sender "William Currier, 462 Railroad Street, Saint Johnsbury, VT 05819" ("Subject Parcel #2"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #2 weighs 0 pounds, 0.40 ounces and is further described in Attachment A.

c. U.S. First-Class parcel number **9500115375968088093263**, mailed to "Kodus Hollon, 170 Ashley Creek Drive, Newnan, GA 30263" from sender "William Currier, 462 Railroad Street, Saint Johnsbury, VT 05819" ("Subject Parcel #3"), for evidence or

instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #3 weighs 0 pounds, 0.40 ounces and is further described in Attachment A.

d. U.S. Priority Mail parcel number **9505515375968088093303**, mailed to "David Perez, 208 Cartwell Drive, Virginia Beach, VA 23452-1422," from sender "William Currier, 462 Railroad Street, Saint Johnsbury, VT 05819" ("Subject Parcel #4"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #4 weighs 3 pounds, 14.20 ounces and is further described in Attachment A.

e. U.S. Priority Mail parcel number **9505515375968088093297**, mailed to "Alex Guariglia, 491 Vizcay Way, Davenport, FL 33837-2618," from sender "William Currier, 462 Railroad Street, Saint Johnsbury, VT 05819" ("Subject Parcel #5"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #5 weighs 0 pounds, 2.60 ounces and is further described in Attachment A.

f. U.S. Priority Mail parcel number **9505515375968088093280**, mailed to "Jonathan Tipton, 426 Elgin Street, Mooringsport, LA 71060-8960," from sender "William Currier, 462 Railroad Street, Saint Johnsbury, VT 05819" ("Subject Parcel #6"), for evidence or instrumentalities of violations of Title 21 U.S.C. §§ 841(a)(1), and 846. Subject Parcel #6 weighs 0 pounds, 2.60 ounces and is further described in Attachment A.

7. The parcels are presently in the possession of the U.S. Postal Inspection Service at 8 New England Drive, Essex Junction, VT 05452.

PROBABLE CAUSE

8. On March 30, 2018, Agent West relayed the following information to me as it related to the case prior to my involvement:

a. U.S. Postal Inspector Kristin Miller discovered, and informed Agent West that a large quantity of U.S. Postal Service (USPS) Priority Mail shipping boxes had been ordered and received at P.O. Box 22 at the East Burke, Vermont, Post Office ("P.O. Box 22"). Based on my training and experience, I'm aware that shippers of contraband items often order shipping boxes through the mail. According to the application for P.O. Box 22, it is registered to Tracy Baker of 3585 Darling Hill Road, East Burke, VT. The application also lists Sammy Bent, Isabella Sepulveda-Muniz, Chelsea Baker, and Sammy Bent Jr. as additional names authorized to accept mail at P.O. Box 22.

b. Baker listed a vehicle with a Vermont license plate DSK573 on the application for P.O. Box 22. Based on Department of Motor Vehicle ("DMV") records, Agent West found that this vehicle is a 2013 Blue Honda CRV and is registered to Tracy Baker. Agent West also obtained Baker's DMV photograph.

c. On March 19, 2018, Agent West observed a Honda CRV matching the description of Baker's vehicle, and a Honda Accord with a RI license plate number CN117 in the driveway of 3585 Darling Hill Road, East Burke, VT 05851.

d. On March 20, 2018, Agent West saw the Honda CRV at the East Burke, VT Post Office. He also saw a white female matching the description of Tracy Baker, based on the review of Baker's DMV photograph. Later that day he also observed the previously observed Honda Accord and Honda CRV at the same residence. Later that day, Agent West spoke to Postmaster Nancy Cote at the East Burke, VT Post Office. Cote stated that P.O. Box 22 received multiple international and domestic parcels. The international parcels were small and square while some of the domestic parcels were from California, and larger in size. Clerk Sean O'Connor at East Burke, VT Post Office stated he did not see Tracy Baker mail any parcels from

East Burke but saw her ship parcels at other Post Offices in the area. O'Conner primarily works at the North Concord, VT Post Office and occasionally will assist in other offices such as, but not limited to Lyndonville, VT; and East Burke, VT. Postmaster Cote stated she never saw Sam Bent but she saw a woman who identified herself as the sister of Tracy Baker's boyfriend. The woman was described as possibly African American. Cote informed Agent West that an international parcel from Poland was delivered to P.O. Box 22 on March 19, 2018.

9. On March 23, 2018, Agent West, Inspector Miller, and I went to the East Burke, VT Post Office and spoke with Clerk Rebecca Johnson. Johnson stated that she only saw Tracy Baker once at the East Burke, VT Post Office.

10. I later received a call from Postmaster Carmen Riendeau of Orleans, VT Post Office and was informed that Clerk Imre Bogar reported that on March 22, 2018, a woman shipped eight parcels with fictitious return addresses. Clerk Bogar identified the return addresses as fictitious because he was aware the listed streets did not exist in the listed towns. The parcels were shipped the previous night.

11. On March 26, 2018, Cote emailed me a picture of a parcel addressed to Djeneba Bent being delivered to PO Box 22. I sent the information to Agent West, who then obtained a DMV photo of Djeneba Bent. Agent West traveled to Orleans, VT Post Office and showed Bogar the photo of Djeneba Bent. Bogar informed Agent West that he was 95 percent sure it was the same female who had mailed the parcels on March 22, 2018.

12. On March 27, 2018, Agent West drove past 3585 Darling Hill Road, East Burke, VT, and observed the trash at the roadside in a black receptacle. Agent West and I met at the West Burke Town Office and went to the Lyndonville, VT Post Office and spoke to Clerk Lisa Smith-Bean. After being shown the picture of Djeneba Bent, Smith-Bean stated that she thought

Djeneba Bent received international parcels at a PO Box in the past, but now she comes in about once a month to mail out parcels.

13. Later that day Agent West and I met with an employee from the West Burke recycling center. After verifying that the collection bay of the trash collection vehicle was empty, Agent West accompanied the employee in his trash collection vehicle. I followed behind the trash collection vehicle in my unmarked Law Enforcement Vehicle (LEV) and witnessed the employee approach the black trash receptacle in front of the residence at 3585 Darling Hill Road, East Burke, VT. The employee removed two trash bags from the receptacle and put them in the empty collection bay of the truck. I then followed the truck approximately half a mile down the road and took possession of the trash. The trash collection vehicle made no additional stops after collecting the trash from 3585 Darling Hill Road, East Burke, VT. Agent West then entered my LEV, and I brought him back to his LEV, located at the West Burke Town Office. I followed Agent West to the St. Johnsbury, VT State Police (VSP) barracks. Agent West and I examined the contents of the two trash bags and discovered, among other items, three rubber gloves, and three opened shipping envelopes from Spain. One of the three envelopes was addressed to Sam Bent at P.O. Box 22. A clear plastic baggie containing an unknown white residue was also discovered. The baggie and residue were transported to the Vermont Forensic Laboratory for testing.

14. On March 28, 2018, I emailed a photo of Djeneba Bent to Post Office Operation Manager (POOM) Jerome Reen. I requested Reen disseminate the photo to various Postmasters in the northern VT area, and to notify me if anyone saw her mailing parcels out of their Post Offices. In response to my request, I was informed that Djeneba Bent reportedly mailed multiple

parcels from Littleton, NH; Danville, VT; West Burke, VT; Lower Waterford, VT; Lyndonville, VT; and St. Johnsbury, VT.

15. Postmaster John Robie, of the Littleton, NH Post Office stated Djeneba Bent was seen at the Littleton, NH Post Office the same day her picture was emailed out by Reen. She mailed two Priority Mail boxes and "several" small manila envelopes. She used an address with an incorrect zip code, and corrected it after the clerk alerted her of the error. She used the return address of Wayne Switser, 46 Cottage Street, Littleton, NH 03561. She was seen driving a gray Honda, RI plate number CN117. The Postmaster emailed me a picture of the parcels which were shipped, and a picture he took of the license plate of the vehicle used by Djeneba Bent which matched the one reported by Agent West seen on the Accord at 3585 Darling Hill Road, East Burke, VT.

16. On March 29, 2018, I met Agent West at the East Burke, VT Post Office to conduct an extended border search on two international parcels from Spain for P.O. Box 22. Both parcels had stamps originating from Spain, and matched the appearance to the three opened envelopes discovered in the trash of the Darling Hill Road residence on March 27, 2018. Both parcels contained two vacuum sealed bags which contained a dark thick substance. The evidence was secured and transported to the VSP Barracks in Derby, VT. The vacuum sealed bags from one of the parcels weighed approximately 26.6 grams. It should be noted that the vacuum sealed bags were marked in ink with "20" and "5". Sergeant Sean Loan with the VSP VT Drug Task Force ran multiple field tests on the substance. The substance tested positive for heroin, and negative for Tetrahydrocannabinol (THC).

17. On March 29, 2018, Clerk Karen Rice of the Danville, Vermont Post Office, emailed me to report that Djeneba Bent shipped six parcels at the Danville, VT Post Office that

day. These subject parcels are further described in Attachment A. The return address on all the parcels was William Currier 462 Railroad St., Saint Johnsbury, VT 05819. This return address was familiar to law enforcement. According to Agent West, HSI in NY were conducting an undercover investigation involving the online order and purchase using bitcoin, of approximately \$70 worth of Lysergic Acid Diethylamide (LSD). On March 13, 2018, in response to an order placed by an undercover HSI agent as part of the investigation, Special Agents (SA) with HSI in NY seized a mail parcel containing suspected LSD blotter paper tabs. The return address on the label was William Currier 462 Railroad St., Saint Johnsbury, VT 05819.

18. Agent West contacted the U.S. Postal Service (USPS) Carrier for the route that includes 462 Railroad Street who explained that he was unsure if a person named Currier lived at the address. The Carrier explained that 462 Railroad Street is an apartment building. He further explained that in the past, he has not delivered mail addressed to William Currier at 462 Railroad Street because of his concerns that Currier does not live there.

19. On March 30, 2018, Lyndonville Postal Clerk Smith-Bean reported that Djeneba Bent shipped two parcels from the Lyndonville, VT Post Office. Inspector Miller retrieved parcels mailed by Djeneba Bent from Lyndonville, VT; Danville, VT; and West Burke, VT. Inspector Miller also collected a parcel, which arrived at East Burke, VT Post Office for PO Box 22 in the name Sam Bent. All mentioned parcels are now being held at the Postal Inspection Service Office, located at 8 New England Drive, Essex Junction, VT 05452.

20. Upon further investigation, it was discovered that at least some of the names and addresses being used for the return addresses by Djeneba Bent belonged to individuals on the sex offender registry. It is suspected that the names and addresses of sex offenders are used on the return address to conceal her identity.

21. I also know from my training and experience the following:

a. Drug traffickers mailing controlled substances frequently use U.S. Postal Service Priority Mail Express and Priority Mail services to ship unlawful controlled substances, and the recipients of those unlawful drugs often use U.S. Postal Service Priority Mail Express and Priority Mail services to ship the proceeds of the illegal sale of controlled substances. These controlled substances and the proceeds of the illegal sale of controlled substances are often found during parcel investigations and interdictions.

b. Drug traffickers use U.S. Postal Service Priority Mail Express and Priority Mail services because of the reliability of delivery, speed of delivery, low cost, the customer's ability to track the package's shipment online, as well as the low risk of detection by law enforcement. Shippers using Priority Mail Express and Priority Mail services pay for the benefit of being able to confirm the delivery of the parcel by checking the U.S. Postal Service internet website or calling a toll free number.

c. Drug traffickers who mail controlled substances, and the drug purchasers who send payment in the form of cash or other drugs, often use false or incomplete information in labeling the parcels, as well as dated information. In this way, drug traffickers can distance themselves from the package containing controlled substances or from the proceeds of the sale of the controlled substances in the event the package is intercepted by law enforcement.

CONCLUSION


22. I respectfully submit that, pursuant to 18 U.S.C. § 3103a(b), there is "reasonable cause to believe that providing immediate notification of the execution of the warrant may have an adverse result." Providing notice to the anticipated recipients of the Subject Parcels would seriously jeopardize the ongoing investigation. Depending on the results of the search, law

enforcement will be considering an undercover delivery of one or more of the packages, and the possibility of additional search warrants. A disclosure would give subjects of the investigation an opportunity to destroy evidence, change patterns of behavior, notify co-conspirators, conduct financial transactions to hide assets, and/or flee from prosecution.

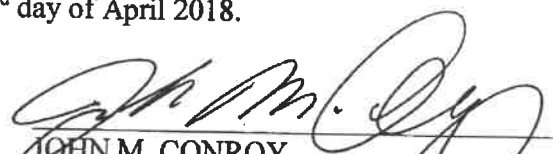
23. It is further requested that the Court authorize execution of this warrant at any time of day or night, as the Subject Parcels are in law enforcement custody.

24. Based on the foregoing, I believe that there is probable cause to search the six Subject Parcels for evidence or instrumentalities of violations of 21 U.S.C. §§ 841(a)(1) and 846.

Dated at Burlington, in the District of Vermont, this 3rd day of April 2018.


JONATHAN DUNHAM
U.S. Postal Inspector

Subscribed and sworn to before me this 3rd day of April 2018.


JOHN M. CONROY
United States Magistrate Judge
District of Vermont